

C.S., ET AL v. CRAIG MCCRUMB, ET AL

DEPOSITION OF MICHAEL PAPANEK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

C.S., by her next friend,  
ADAM STROUB,

Plaintiff,

v

File No. 2:22-CV-10993-TGB

CRAIG MCCRUMB,  
Individually and in his official  
Capacity as Superintendent of  
Durand Area Schools,

and

AMY LEFFEL, Individually and  
in her Capacity as Principal  
of Robert Kerr Elementary  
School,

and

MICHAEL PAPANEK,  
Individually and in his  
official Capacity as On  
Track Coach of Robert  
Kerr Elementary School,

Defendants.

/

DEPOSITION OF MICHAEL PAPANEK

Taken by the Plaintiff on the 2nd day of December, 2022, at  
432 North Saginaw Street, Flint, Michigan, at 10:00 a.m.

## C.S., ET AL v. CRAIG MCCRUMB, ET AL

## DEPOSITION OF MICHAEL PAPANЕК

<p>1 APPEARANCES:  2 For the Plaintiff: MR. JOHN R. MONROE  3 John Monroe Law PC  4 156 Robert Jones Road  5 Dawsonville, Georgia 30534  6 (678) 362-7650  7 For the Defendant: MR. DANIEL J. LOBELLO, JR. (P81069)  8 O'Neill Wallace &amp; Doyle PC  9 300 Saint Andrews Road, Suite 302  10 Saginaw, Michigan 48638  11 (989) 790-0960  12 Also Present: Adam Stroub  13 Craig McCrumb  14  15 RECORDED BY: Eric R. Johnston, CER 9267  16 Certified Electronic Recorder  17 Network Reporting Corporation  18 Firm Registration Number 8151  19 1-800-632-2720  20  21  22  23  24  25</p> <p style="text-align: center;">Page 2</p>	<p>1 Flint, Michigan  2 Friday, December 2, 2022 - 10:38 a.m.  3 REPORTER: Do you solemnly swear or affirm that  4 the testimony you're about to give will be the whole truth?  5 MR. PAPANЕК: Yes.  6 MICHAEL PAPANЕК  7 having been called by the Plaintiff and sworn:  8 EXAMINATION  9 BY MR. MONROE:  10 Q Could you state your name for the record, please?  11 A <b>It's Michael Joseph Papanек.</b>  12 Q And you were here before when I was taking Ms. Leffel's  13 deposition; is that correct?  14 A <b>Yes.</b>  15 Q So I assume you heard all the preliminary instructions I  16 gave her?  17 A <b>Yes.</b>  18 Q I won't go through them again unless you have any questions  19 about them.  20 A <b>I don't think so.</b>  21 Q Good. Can you tell me about your educational background,  22 please?  23 A <b>Yes. I have -- if you're referring to college, I have a</b>  24 <b>bachelor's degree from Michigan State University in</b>  25 <b>political science. I also had some -- I also had education</b></p> <p style="text-align: center;">Page 4</p>
<p>1  2  3  4  5  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: center;">TABLE OF CONTENTS</p> <p style="text-align: right;">PAGE</p> <p>Examination by Mr. Monroe . . . . . 4</p> <p style="text-align: center;">EXHIBIT INDEX</p> <p style="text-align: right;">PAGE</p> <p>Deposition Exhibit 1 marked . . . . . 7  (Photograph of hat)</p> <p style="text-align: center;">Page 3</p>	<p>1 <b>background at Michigan State, education classes.</b>  2 Q Do you have any other schooling after your bachelor's  3 degree?  4 A <b>Like, another degree?</b>  5 Q Yes.  6 A <b>No.</b>  7 Q You just have, like, continuing education kind of classes?  8 A <b>I -- yeah, I had -- because I had a teacher certification</b>  9 <b>through Michigan State.</b>  10 Q And where are you employed?  11 A <b>At Durand Area Schools, specifically Robert Kerr Elementary</b>  12 <b>School in Durand, Michigan.</b>  13 Q How long have you been there?  14 A <b>At Robert Kerr, I believe this is my seventh year.</b>  15 Q And where were you before that?  16 A <b>At Durand Middle School in Durand, Michigan. And I was</b>  17 <b>there since 2000.</b>  18 Q And what's your position at Robert Kerr Elementary?  19 A <b>On Track Coach.</b>  20 Q And what does that mean?  21 A <b>It basically means I'm there to try to help students stay on</b>  22 <b>track with their behavior specifically. So if a student is</b>  23 <b>sent out of class for a behavior-related situation, they're</b>  24 <b>generally sent to my room. And -- or if the student needs</b>  25 <b>to take a break, a lot of times they'll come to my room;</b></p> <p style="text-align: center;">Page 5</p>

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1 give them some time before they go back to class. And my --  
 2 I also deal with recess detentions, in-school suspensions.  
 3 Q When you say "deal with them," does that mean as a general  
 4 matter you're the one who imposes the suspensions?  
 5 A No, that they're in my room while they serve their  
 6 suspension if it's an in-school suspension or when they  
 7 serve their detention for a recess detention.  
 8 Q I see. But someone else might have imposed that punishment?  
 9 A Correct.  
 10 Q And you were in that position as On Track Coach on February  
 11 17th of 2022; is that right?  
 12 A Right.  
 13 Q And can you tell me how you first came involved in the  
 14 incident that this case is about?  
 15 A Sure. C.S.'s locker is pretty close to -- or was pretty  
 16 close to across the room, across the hallway from my door at  
 17 my room. And so when this occurred -- oftentimes she and  
 18 some other students will come to my door and say hi and --  
 19 or come into the room and say hi and talk to me. And on  
 20 that day she came to my room and came into a little bit and  
 21 said hi and spoke for a little bit, had a little  
 22 conversation.  
 23 Q And how did that involve this -- the incident, then?  
 24 A When we spoke, I noticed that she had a hat on. And I took  
 25 a little -- I took a little closer look to see what it was

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1 on her hat and I noticed what was on the hat. And that --  
 2 that started the whole situation.  
 3 Q And what did you notice on the hat?  
 4 A I think what I basically noticed was the gun on the hat.  
 5 That's what -- that's what received my attention.  
 6 Q Did anything else about the hat get your attention?  
 7 A At that -- at that point I'm not sure if it did.  
 8 MR. MONROE: I do have another copy. Let's mark  
 9 this.  
 10 REPORTER: Exhibit 1?  
 11 MR. MONROE: That's fine.  
 12 (Deposition Exhibit 1 marked)  
 13 Q I'm showing you what's been marked as Exhibit 1 for your  
 14 deposition. Is that a picture of the hat that you saw C.S.  
 15 wearing that day?  
 16 A It looks like it.  
 17 Q Okay. And then what -- after you noticed the hat, then did  
 18 you say anything to C.S. about the hat?  
 19 A I'm trying to recall. I can't -- I can't say for sure. I  
 20 don't recall.  
 21 Q And then what happened then after that that was related to  
 22 the incident?  
 23 A After that I think -- I think C.S. left my room and went on.  
 24 And I think soon after that, I went down to the office where  
 25 Ms. Leffel and Mr. McCrumb were in her office. And I went

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1 to see Ms. Leffel, and I told her what C.S. -- that C.S. had  
 2 the hat and what was on it. And I think I described it to  
 3 her.  
 4 Q Was that the purpose of you going --  
 5 A Yes.  
 6 Q -- to Ms. Leffel's office --  
 7 A Yes.  
 8 Q -- was to discuss the hat with her?  
 9 A Yes.  
 10 Q And what did you tell her about the hat?  
 11 A As far as I recall, I told her that C.S. had a hat with a  
 12 gun on it.  
 13 Q Anything else?  
 14 A I don't recall.  
 15 Q And then what was the purpose in you going there?  
 16 A To -- I -- I guess my purpose was that I felt that the hat  
 17 probably was against the rules of the school and that I  
 18 needed to let -- I felt that I needed to let an  
 19 administrator know what the situation was so that they could  
 20 make a decision if we -- needed to be a decision made on it.  
 21 Q Okay. I guess the way you said that makes me think you  
 22 don't view yourself as an administrator; is that right?  
 23 A No, I'm not an administrator.  
 24 Q All right. I guess I inferred that you were. How would you  
 25 describe your position?

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1 A My position is -- it's -- it doesn't fit neatly into a lot  
 2 of positions. I guess as close as you could say -- I guess  
 3 you could say I'm support staff. I support everyone in the  
 4 school. I support the teachers. I support the  
 5 administration, the secretary. I'm there for support, even  
 6 supporting students. So I guess you could say I'm support  
 7 staff.  
 8 Q So you went to tell Mrs. Leffel about it to -- because you  
 9 thought someone from administration should know about it.  
 10 Were you looking to her for guidance on anything to do or  
 11 were you just basically reporting it to her?  
 12 A I was -- I suppose in a way both. I was reporting it to  
 13 her. And I was reporting to her so that she could give her  
 14 administrative input to the situation.  
 15 Q And what was her reaction?  
 16 A As I recall, she -- her reaction was that she -- she --  
 17 that a student wouldn't be able to wear a hat like that.  
 18 Q Did she give you any direction?  
 19 A At that point I know that when she and I talked, I came out  
 20 of the conversation -- between us, we discussed and it was  
 21 discussed that a call could be made home and the person at  
 22 home, the parent, could be asked if another hat could be  
 23 brought to school so that C.S. could wear that hat instead  
 24 of the hat she was wearing.  
 25 Q It sounds like that wasn't necessarily Ms. Leffel's

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3 (Pages 6 to 9)

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1 direction? That was a collaborative decision?

2 **A I don't recall if that was her initiative or mine after Ms.**

3 **Leffel gave the indication that that hat wouldn't be**

4 **appropriate for school.**

5 Q Does that mean that she did give you an indication at that

6 conversation that the hat was not appropriate?

7 **A Yes; yes; yes.**

8 Q So you told her about the hat?

9 **A Uh-huh; yes.**

10 Q You described it to her, she said it wouldn't be

11 appropriate, and somehow or another it was decided to call

12 home and see if a different hat could be provided?

13 **A Yes.**

14 Q And then was there any more to the conversation at that

15 point?

16 **A At that point, I don't recall. I don't believe so. But I**

17 **can't say for sure.**

18 Q And you said Mr. McCrumb was present in the office at that

19 time?

20 **A Yes; yes.**

21 Q Did he participate in the conversation?

22 **A If he did, it was limited and he didn't make any decision.**

23 Q Then did you leave the office?

24 **A I did.**

25 Q And what did you do then?

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1 **A Then I -- as I recall, I went back to my office, my room and**

2 **I called C.S.'s parents.**

3 Q Do you have something like a classroom?

4 **A It's a small room with a few desks in it. There's actually**

5 **a desk -- there's specifically spots for five different**

6 **students in there. So it's a smaller room. If you would**

7 **call -- it's not really a classroom, but it's a -- if it**

8 **would be a classroom, it would be a very small classroom.**

9 Q So you have a phone in your room?

10 **A I do.**

11 Q And you called C.S.'s parents?

12 **A Yes.**

13 Q And to whom did you speak?

14 **A At first --**

15 Q Did anyone answer the phone?

16 **A They did, yes.**

17 Q Okay.

18 **A At first I spoke with C.S.'s mom.**

19 Q Okay.

20 **A And I asked her -- I explained to her the situation, and**

21 **once I explained the situation she said that -- she**

22 **basically indicated to me that it would be better -- or that**

23 **she should put C.S.'s father on the phone, that she thought**

24 **that he should deal with the situation.**

25 Q And do you recall what you said to C.S.'s mother?

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1 **A I don't specifically remember the exact conversation. But I**

2 **know that I would have told her, "C.S. has a hat that's**

3 **been -- that is considered not appropriate for school and we**

4 **were wondering if someone could come and bring her a**

5 **different hat."**

6 Q And she said, "You should discuss that with C.S.'s father"?

7 **A Yes.**

8 Q And then did she put him on the phone?

9 **A Yes.**

10 Q Okay.

11 **A And then I spoke with C.S.'s father.**

12 Q Do you remember what you said to him?

13 **A I think I basically said the same thing that I had said to**

14 **C.S.'s mother. And so that -- just, you know, that she has**

15 **a hat that school considers inappropriate. We were**

16 **wondering if someone could come and bring a different for**

17 **her.**

18 Q And how did he respond?

19 **A He responded that -- and I know specifically he told me at**

20 **least a couple of things -- was that no one -- no one better**

21 **lay a hand on her hat, something to that effect. Maybe not**

22 **those exact words. But no one -- no one better touch C.S.'s**

23 **hat -- or that hat. And I said no one's touched her hat, no**

24 **one's -- and he also said that the 1st Amendment does not**

25 **end at the schoolhouse gates.**

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1 Q Did he say anything else?

2 **A I'm trying to recall right now. I can't recall at the**

3 **moment if there was anything more specifically that he said.**

4 Q Did he say that he would or wouldn't bring a different hat?

5 **A He may have specifically said that. I don't recall. But**

6 **just from what he said, I -- I certainly took it to mean**

7 **that he was not going to bring a different hat.**

8 Q Was there anything more to the conversation then?

9 **A Not that I recall. I think at the end -- I think he said,**

10 **"Have a good day." And he hung up.**

11 Q And then what did you do?

12 **A Then I -- as I recall I went and spoke to C.S. And I asked**

13 **her -- I think I brought her to my area, my room -- or near**

14 **my room. And I asked her if she would take off her hat and**

15 **put it in the locker -- in her locker. And she was**

16 **receptive to that. She indicated that she would. And she**

17 **just put it in her locker.**

18 Q Does that mean you -- you left your room and you went to

19 C.S.'s classroom and took her out of class and had that

20 conversation?

21 **A As far as I recall, I believe so. I believe at that point**

22 **she was in her classroom, I believe. I can't say 100**

23 **percent sure. But I did go and get her and then have that**

24 **conversation with her.**

25 Q And then she put her hat in her locker?

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<p>1 <b>A She did.</b></p> <p>2 Q And then went back to class?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Or to class?</p> <p>5 <b>A Yes, I believe she did.</b></p> <p>6 Q Was that the end of your interaction with her as -- did you</p> <p>7 walk with her to her locker, or it was right there anyway?</p> <p>8 <b>A She -- it -- yeah, her locker is very close to my room so it</b></p> <p>9 <b>was a very short walk kind of across the hallway.</b></p> <p>10 Q All right. And then was there any other interaction with</p> <p>11 her or you then went back to your room and she went to her</p> <p>12 room?</p> <p>13 <b>A She -- I assume that after she just went to her room because</b></p> <p>14 <b>there was no -- I don't think anything was indicated that</b></p> <p>15 <b>there would be any discipline -- any discipline action, just</b></p> <p>16 <b>that the hat would be off. I believe she went to her room.</b></p> <p>17 <b>And I assume at that point -- I'm trying to remember if --</b></p> <p>18 <b>if I went back across the hall to my room or -- I assume I</b></p> <p>19 <b>did. I just can't recall at that point.</b></p> <p>20 Q Did you tell C.S. that she couldn't wear the hat like for</p> <p>21 the rest of the day or anything like that?</p> <p>22 <b>A I don't believe so. I think all's I asked was that -- I</b></p> <p>23 <b>just asked, "Can you put your hat in the locker?" And she</b></p> <p>24 <b>was receptive to it.</b></p> <p>25 Q Okay. And did you have any further conversation with Ms.</p> <p style="text-align: center;">Page 14</p>	<p>1 Q I mean, you can infer I think pretty fairly from Ms.</p> <p>2 Leffel's email to Mr. Stroub that she was aware of it. And</p> <p>3 I just didn't know how she became aware of it, if you had</p> <p>4 told her that or --</p> <p>5 <b>A I may have. I just -- if I did, I can't recall it.</b></p> <p>6 Q Then did you have any other communication with anybody about</p> <p>7 it before the lawsuit was filed?</p> <p>8 <b>A Not that I recall.</b></p> <p>9 Q Did you have any -- when you noticed the rifle on the hat</p> <p>10 and thought that it might not be appropriate, had you had</p> <p>11 any -- had you had any experience with a student wearing</p> <p>12 clothing depicting any kind of weapon before that that you</p> <p>13 had had to deal with?</p> <p>14 <b>A Not that I can recall.</b></p> <p>15 Q So if this was your first experience with it, did you have a</p> <p>16 preconceived notion of whether that was allowed or not</p> <p>17 allowed?</p> <p>18 <b>A Yes. My thought -- my basic thought on it was that it</b></p> <p>19 <b>probably wasn't something that the school would allow.</b></p> <p>20 Q Did you have any further communication with C.S. about it on</p> <p>21 that day or on a later day?</p> <p>22 <b>A Not that I recall. I don't believe I ever spoke with C.S.</b></p> <p>23 <b>about that again.</b></p> <p>24 Q Did you have any further communication with either of the</p> <p>25 C.S.'s parents about it after the -- the one phone call that</p> <p style="text-align: center;">Page 16</p>
<p>1 Leffel about it?</p> <p>2 <b>A I don't recall if -- after that if I did. I don't recall.</b></p> <p>3 <b>At this point I don't recall.</b></p> <p>4 Q Did you have any further conversation with Ms. Leffel about</p> <p>5 the incident at all even on a later date or anything?</p> <p>6 <b>A Oh, I'm trying to recall how -- we would have spoken about</b></p> <p>7 <b>the situation at some point. I just don't remember how</b></p> <p>8 <b>much -- how long after that it was. As far as -- I thought</b></p> <p>9 <b>the situation was done then. So at what point we spoke</b></p> <p>10 <b>again, it -- it may have been awhile after that. I don't</b></p> <p>11 <b>recall how much longer.</b></p> <p>12 Q Have you seen the email exchange between Mr. Stroub and Ms.</p> <p>13 Leffel about it?</p> <p>14 <b>A I may have seen some of that but I don't recall</b></p> <p>15 <b>specifically. Ms. Leffel may have shown me some, but I</b></p> <p>16 <b>can't say for sure.</b></p> <p>17 Q Did you talk to Ms. Leffel about what action you had taken</p> <p>18 so that she would be aware of it?</p> <p>19 <b>A I -- I may have. I just -- I -- you mean, like, once the</b></p> <p>20 <b>hat was in the locker?</b></p> <p>21 Q Yes.</p> <p>22 <b>A I may have. I just -- I don't -- like, that day? Later</b></p> <p>23 <b>that day?</b></p> <p>24 Q At any point.</p> <p>25 <b>A At any point? I may have. I can't say for sure.</b></p> <p style="text-align: center;">Page 15</p>	<p>1 you've described so far?</p> <p>2 <b>A I don't believe we ever spoke about it after that; not that</b></p> <p>3 <b>I recall.</b></p> <p>4 MR. MONROE: Okay. That's all I have.</p> <p>5 MR. LOBELLO: I don't have any questions.</p> <p>6 (Deposition concluded at 10:57 a.m.)</p> <p>7</p> <p>8 -0-0-0-</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 17</p>

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